

## **SCHEDULE A**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
(EASTERN DIVISION)

_____	)	
In re	)	
	)	
INFOMOTION SPORTS	)	Chapter 11
TECHNOLOGIES, INC.	)	Case No. 16-10724-JNF
	)	
Debtor.	)	
_____	)	

**LIQUIDATING TRUSTEE'S APPLICATION FOR AUTHORITY  
TO EMPLOY HIS FIRM AS COUNSEL UNDER GENERAL RETAINER**

David B. Madoff (the "Liquidating Trustee"), the liquidating trustee of the above-captioned Debtor, hereby applies for an order of this Court, authorizing the Liquidating Trustee to employ himself and his law firm, Madoff & Khoury LLP (the "Firm"), as his counsel in this Chapter 11 case. As grounds therefor, the Trustee states:

1. On March 16, 2017, the Debtor filed a petition for relief under Chapter 11 of the Bankruptcy Code. By Order dated December 19, 2016, the Court confirmed the Debtor's Chapter 11 Plan of Reorganization (the "Plan").

2. Pursuant to Section 5.1 of the Plan, the Liquidating Trustee was appointed. His appointed charged him with objecting to claims and prosecuting avoidance actions, if any. Section 327 of the Bankruptcy Code authorizes the Liquidating Trustee to employ counsel with the approval of this Court.

3. The Liquidating Trustee will need the advice of and representation by counsel on all legal matters affecting the Debtor's estate, including but not limited to the consummation of the Debtor's Chapter 11 Plan, including authority to object to any unpaid claims and pursue and

01/25/2017 Application granted.

*John H. Fanning*

## **SCHEDULE B**

**MADOFF & KHOURY LLP**

ATTORNEYS AT LAW

PINE BROOK OFFICE PARK  
124 WASHINGTON STREET, SUITE 202  
FOXBOROUGH, MASSACHUSETTS 02035

TELEPHONE: (508) 543-0040  
TELECOPIER: (508) 543-0020

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Re: Infomotion

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
1/4/2017 -	DBM	Correspondence with Brian Lease and Warren Agin regarding receipt of funds	0.10 375.00/hr	37.50
1/5/2017 -	DBM	Telephone conference and correspondence with Mark Cunneen regarding letter stating likely result for equity holders	0.30 375.00/hr	112.50
-	DBM	Correspondence with James Gross regarding potential preference claims	0.20 375.00/hr	75.00
1/10/2017 -	JCG	Conference with David Madoff regarding case status and commenced review of disclosure statement and other documentation regarding Chapter 5 claims that may be pursued by liquidating trustee	0.40 375.00/hr	150.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/11/2017	- DBM	Correspondence with Warren Agin regarding transition issues and transfer of funds	0.30 375.00/hr	112.50
1/12/2017	- JCG	Reviewed schedules, plan and disclosure statement, examiner's report and commenced review of claims	2.40 375.00/hr	900.00
1/13/2017	- MLA	Prepared Motion to Employ Firm with signed statement, declaration and certificate of service; memorandum from James Gross regarding same	0.80 150.00/hr	120.00
1/16/2017	- MLA	Prepared documents for filing; reviewed David Madoff changes and filed same	0.30 150.00/hr	45.00
1/17/2017	- MLA	Refiled Motion to Employ	0.10 150.00/hr	15.00
1/24/2017	- JCG	Reviewed claims in preparation of possible objections	0.20 375.00/hr	75.00
	- JCG	Reviewed claim of Russell Brands and reviewed docket regarding any impact on claim	0.20 375.00/hr	75.00
	- JCG	Drafted email to J. Bender, attorney for Russell Brands, regarding claim and request for documentation	0.30 375.00/hr	112.50
	- JCG	Conference with liquidating trustee regarding objection to claims and treatment of secured claims under plan	0.30 375.00/hr	112.50
1/26/2017	- JCG	Drafted motion for authority to file omnibus objection to claims	0.80 375.00/hr	300.00
	- JCG	Drafted omnibus objection to claims and notice of omnibus objection to claims	1.10 375.00/hr	412.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/31/2017	- JCG	Revised and arranged to file omnibus objection to claims and motion for authority to file omnibus objection	0.30 375.00/hr	112.50
	- JCG	Reviewed documents and pleadings regarding potential preference actions	0.90 375.00/hr	337.50
	- MLA	Prepared certificate of service for objection to claims and Motion for Leave; filed and served same	0.60 150.00/hr	90.00
2/2/2017	- JCG	Reviewed file regarding payments to M. Crowley, T. Crowley and M. Davison regarding potential preference payments	1.10 375.00/hr	412.50
	- JCG	Drafted demand letters to M. Crowley, T. Crowley and M. Davison regarding return of preferential payments	1.30 375.00/hr	487.50
	- MLA	Prepared certificate of service and notice of hearing on claims objection; filed and served same	0.50 150.00/hr	75.00
2/3/2017	- DBM	Correspondence with Warren Agin regarding priority claims	0.10 375.00/hr	37.50
2/7/2017	- JCG	Telephone conference with Gary Cruickshank regarding demand letters sent to the Crowleys and Davisson and agreement to extend time to respond to demand	0.30 375.00/hr	112.50
	- JCG	Drafted email to Gary Cruickshank confirming extension	0.10 375.00/hr	37.50
	- JCG	Reviewed response of Russell Brand to objection to claim	0.20 375.00/hr	75.00
2/14/2017	- JCG	Drafted email to W. Agin regarding claim of Russell Brand regarding objection to its proof of claim and reviewed response	0.20 375.00/hr	75.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/16/2017	- JCG	Reviewed material and documents regarding Russell Brands' proof of claim	0.50 375.00/hr	187.50
	- JCG	Drafted email to J. Bender, attorney for Russell Brands regarding further questions regarding proof of claim	0.20 375.00/hr	75.00
2/28/2017	- JCG	Reviewed email from J. Bender, attorney for Russell Brands, regarding Trustee's objection to claim and possible settlement	0.10 375.00/hr	37.50
	- JCG	Reviewed file regarding likely dividend in the case	0.30 375.00/hr	112.50
	- JCG	Drafted email to J. Bender regarding potential dividend and settlement	0.30 375.00/hr	112.50
3/2/2017	- JCG	Reviewed letter and documents from G. Cruickshank, attorney for T. Crowley, M. Crowley and M. Davisson in response to preference demands to each of these entities	0.40 375.00/hr	150.00
	- JCG	Research on issue of insolvency and net operating losses as asset in that analysis	1.30 375.00/hr	487.50
	- JCG	Telephone call with G. Cruickshank regarding his response to preference demand	0.20 375.00/hr	75.00
3/7/2017	- JCG	Research on solvency issue	0.40 375.00/hr	150.00
	- JCG	Drafted very lengthy email to G. Cruickshank, attorney for M. Crowley, T. Crowley and M. Davisson, regarding his response to the demand letters and provided argument supporting preference claims	1.10 375.00/hr	412.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/7/2017	- JCG	Drafted proposed settlement stipulation with Russell Brands regarding settlement of its claim	0.90 375.00/hr	337.50
	- JCG	Drafted email to J. Bender, attorney for Russell Brands, regarding stipulation	0.20 375.00/hr	75.00
3/9/2017	- JCG	Reviewed settlement stipulation executed by Russell Brands	0.10 375.00/hr	37.50
	- JCG	Drafted motion to approve compromise of Russell Brands' claim	1.20 375.00/hr	450.00
	- JCG	Reviewed email from G. Cruickshank, attorney for the Crowleys and Davisson, regarding preference claims and drafted response	0.10 375.00/hr	37.50
3/10/2017	- MLA	Prepared settlement and motion and certificate of service and service list; prepared for filing; filed and served same	1.10 150.00/hr	165.00
3/13/2017	- MLA	Prepared certificate of service regarding objection deadline on Motion to Compromise; filed and served same	0.60 150.00/hr	90.00
3/21/2017	- JCG	Reviewed email from G. Cruickshank and documents objecting to Liquidating Trustee's preference analysis	0.10 375.00/hr	37.50
	- JCG	Drafted email to G. Cruickshank disagreeing with his preference analysis and requesting his agreement to accept service	0.20 375.00/hr	75.00
	- JCG	Telephone call with Gary Cruickshank regarding possible settlement offer	0.10 375.00/hr	37.50



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			<u>Hrs/Rate</u>	<u>Amount</u>
3/21/2017 -	JCG	Research regarding net loss carryover issue and insolvency	0.70 375.00/hr	262.50
3/23/2017 -	JCG	Drafted email to K. Lowey about NOL issue, and telephone call with K. Lowey regarding same	0.30 375.00/hr	112.50
-	DBM	Office conference with James Gross regarding solvency issue, relevance of NOLS	0.20 375.00/hr	75.00
3/28/2017 -	JCG	Telephone call with G. Cruickshank regarding settlement of preference litigation	0.20 375.00/hr	75.00
3/30/2017 -	JCG	Reviewed email from G. Cruickshank regarding settlement proposal of preference claims and telephone call with G. Cruickshank regarding same	0.10 375.00/hr	37.50
-	JCG	Conference with Trustee regarding settlement proposal	0.10 375.00/hr	37.50
4/4/2017 -	JCG	Reviewed email from G. Cruickshank regarding proposed global settlement and conference with Trustee regarding same	0.30 375.00/hr	112.50
-	JCG	Reviewed file and drafted lengthy response to Gary Cruickshank making counteroffer to Davisson and rejecting other two offers	0.50 375.00/hr	187.50
4/6/2017 -	JCG	Drafted lengthy email to Gary Cruickshank regarding settlement offer from his clients, making counteroffer for one defendant, rejecting two other offers, and explanation for positions	0.70 375.00/hr	262.50
4/11/2017 -	JCG	Reviewed email from Gary Cruickshank regarding preference claim and possible settlement and drafted response	0.10 375.00/hr	37.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/11/2017 -	JCG	Telephone call with Gary Cruickshank regarding settlement negotiations	0.10 375.00/hr	37.50
4/13/2017 -	JCG	Telephone call with Gary Cruickshank regarding settlement negotiations and financial difficulties of M. Crowley and T. Crowley and settlement with Davisson	0.20 375.00/hr	75.00
-	JCG	Reviewed email from Gary Cruickshank regarding same	0.10 375.00/hr	37.50
4/20/2017 -	JCG	Reviewed settlement offer from M Davisson regarding preference claim	0.10 375.00/hr	37.50
-	JCG	Telephone call with Gary Cruickshank regarding Davisson settlement	0.20 375.00/hr	75.00
-	JCG	Conference with Trustee regarding settlement offer	0.30 375.00/hr	112.50
-	JCG	Drafted email to Attorney Cruickshank regarding counteroffer to settle Davisson claim	0.40 375.00/hr	150.00
-	JCG	Reviewed response for Gary Cruickshank	0.10 375.00/hr	37.50
4/25/2017 -	JCG	Telephone call with Gary Cruickshank regarding negotiation of Davisson settlement	0.10 375.00/hr	37.50
-	JCG	Reviewed financial statements from M. Crowley and T. Crowley	0.30 375.00/hr	112.50
-	JCG	Reviewed Florida law regarding tenancies by the entirety and protection afforded from creditors	0.60 375.00/hr	225.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/27/2017 -	JCG	Reviewed email from Gary Cruickshank regarding settlement proposed from M. Davisson	0.10 375.00/hr	37.50
-	JCG	Conference with liquidating trustee regarding Davisson settlement and drafted response to Gary Cruickshank	0.30 375.00/hr	112.50
5/2/2017 -	DBM	Several correspondence with Warren Agin and accountant for Debtor regarding 2016 return	0.40 375.00/hr	150.00
5/8/2017 -	DBM	Further discussion and correspondence with Debtor's accountants regarding 2016 returns	0.30 375.00/hr	112.50
5/9/2017 -	JCG	Drafted proposed settlement stipulation between liquidating trustee and M. Davisson regarding alleged preference	1.40 375.00/hr	525.00
-	JCG	Drafted email to G. Cruickshank, attorney for Davisson, regarding settlement stipulation and mechanics of the settlement	0.20 375.00/hr	75.00
5/11/2017 -	JCG	Reviewed email from Gary Cruickshank, attorney for M. Davisson, regarding settlement stipulation	0.10 375.00/hr	37.50
-	JCG	Conference with the liquidating trustee regarding settlement stipulation and liquidating trustee's execution of same	0.10 375.00/hr	37.50
-	JCG	Drafted email to Gary Cruickshank regarding fully executed settlement	0.10 375.00/hr	37.50
-	JCG	Drafted motion to approve settlement with M. Davisson	1.60 375.00/hr	600.00
5/12/2017 -	MLA	Prepared certificate of service; updated service list; filed Motion to Compromise claim and settlement; served same	1.20 150.00/hr	180.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/15/2017 -	MLA	Prepared certificate of service regarding notice of objection deadline; filed and served same	0.70 150.00/hr	105.00
5/18/2017 -	JCG	Drafted email to G. Cruickshank, attorney for the Crowleys regarding potential settlements	0.60 375.00/hr	225.00
9:03 AM				
-	JCG	Telephone call to Gary Cruickshank regarding negotiations of possible settlements	0.20 375.00/hr	75.00
5/25/2017 -	JCG	Drafted email to Gary Cruickshank regarding status of settlement proposals from T. Crowley or M. Crowley	0.10 375.00/hr	37.50
-	JCG	Reviewed email from Gary Cruickshank regarding settlement status	0.10 375.00/hr	37.50
5/30/2017 -	JCG	Prepared for telephone conference with Gary Cruickshank regarding possible settlement of claims against Michael Crowley and Thomas Crowley	0.30 375.00/hr	112.50
-	DBM	Prepared monthly operating reports for January through April; correspondence with Amber Nevers regarding same	1.30 375.00/hr	487.50
6/1/2017 -	JCG	Telephone conference with Attorney Cruickshank regarding negotiation over preference claims against his clients M. Crowley and T. Crowley	0.30 375.00/hr	112.50
6/8/2017 -	JCG	Drafted email to Gary Cruickshank, attorney for T. Crowley and M. Crowley regarding settlement and/or litigation	0.10 375.00/hr	37.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/8/2017	- DBM	Correspondence with Amber Nevers regarding United States Trustee invoices	0.10 375.00/hr	37.50
6/13/2017	- JCG	Reviewed email from Gary Cruickshank regarding counteroffers to settle claims against T. Crowley and M. Crowley and conference with Trustee regarding same	0.30 375.00/hr	112.50
	- JCG	Drafted email to Attorney Cruickshank rejecting counteroffer	0.20 375.00/hr	75.00
6/15/2017	- JCG	Commenced drafting of preference complaint against T. Crowley	1.10 375.00/hr	412.50
6/22/2017	- JCG	Drafted and revised preference complaint against T. Crowley	0.60 375.00/hr	225.00
	- JCG	Drafted and revised preference complaint against M. Crowley	1.30 375.00/hr	487.50
6/23/2017	- MLA	Prepared adversary proceeding cover sheets and filed 2 complaints	0.80 150.00/hr	120.00
6/26/2017	- MLA	Prepared summons certificate of service for Michael and Thomas Crowley; filed and served same; memorandum to Gary Cruickshank regarding service	0.70 150.00/hr	105.00
	- MLA	Reviewed Notice of Deficiency and office conference with David Madoff; telephone call with Court regarding service; prepared certificate of service to Crowley's themselves; filed and served same	0.70 150.00/hr	105.00
6/27/2017	- JCG	Telephone call with Gary Cruickshank regarding complaints against T. Crowley and M. Crowley	0.10 375.00/hr	37.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/27/2017 -	JCG	Reviewed service on defendants	0.10 375.00/hr	37.50
7/11/2017 -	JCG	Conference with liquidating trustee regarding employment as expert for preference litigation	0.20 375.00/hr	75.00
-	JCG	Drafted email to K. Lowey regarding employment and reviewed response	0.30 375.00/hr	112.50
2:22 PM				
7/13/2017 -	JCG	Prepared for conference with K. Lowey regarding expert witness employment	0.40 375.00/hr	150.00
7/20/2017 -	JCG	Drafted email to K. Lowey regarding employment as expert in Crowley litigation	0.10 375.00/hr	37.50
-	JCG	Reviewed response	0.10 375.00/hr	37.50
-	JCG	Reviewed answer of T. Crowley to Trustee's complaint	0.20 375.00/hr	75.00
-	JCG	Reviewed answer of M. Crowley to Trustee's complaint	0.20 375.00/hr	75.00
7/24/2017 -	MLA	Calendared all ap deadlines	0.30 150.00/hr	45.00
7/25/2017 -	JCG	Reviewed scheduling orders in the M. Crowley and T. Crowley adversary proceedings	0.20 375.00/hr	75.00
7/27/2017 -	JCG	Drafted email to K. Lowey regarding employment application	0.10 375.00/hr	37.50
8/1/2017 -	JCG	Drafted two emails to Keith Lowey regarding employment application	0.20 375.00/hr	75.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/1/2017	- JCG	Revised and arranged for the filing of employment application	0.20 375.00/hr	75.00
	- JCG	Telephone call with Keith Lowey regarding issues related to insolvency issue	0.20 375.00/hr	75.00
8/3/2017	- JCG	Drafted email to G. Cruickshank, attorney for Michael and Thomas Crowley regarding 26(f) conferences	0.20 375.00/hr	75.00
	- JCG	Telephone call with G. Cruickshank regarding 26(f) conference scheduling	0.20 375.00/hr	75.00
	- JCG	Commenced drafting proposed joint discovery report	0.30 375.00/hr	112.50
	- MLA	Prepared certificate of service and prepared Motion to Employ Expert Witness for filing; filed and served same	0.60 150.00/hr	90.00
	- MLA	Prepared Certificate of Service and prepared Motion to Employ Expert for filing; filed and served same	0.60 150.00/hr	90.00
8/8/2017	- JCG	Drafted automatic disclosures of M. Crowley	0.80 375.00/hr	300.00
	- JCG	Prepared proposed joint discovery report	0.30 375.00/hr	112.50
8/10/2017	- JCG	Drafted automatic disclosures in connection with preference litigation against M. Crowley	0.80 375.00/hr	300.00
	- JCG	Drafted email to G. Cruickshank regarding same	0.10 375.00/hr	37.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/10/2017	- JCG	Drafted automatic disclosures regarding preference litigation against T. Crowley	0.50 375.00/hr	187.50
	- JCG	Drafted email to G. Cruickshank regarding same	0.10 375.00/hr	37.50
8/21/2017	- JCG	Prepared for and participated in Rule 26(f) conference with Defendants' attorney, G. Cruickshank	0.40 375.00/hr	150.00
8/22/2017	- JCG	Drafted email to K. Lowey regarding insolvency issues	0.10 375.00/hr	37.50
	- JCG	Drafted and revised joint discovery report	0.40 375.00/hr	150.00
8/24/2017	- JCG	Drafted proposed joint discovery report	0.90 375.00/hr	337.50
	- JCG	Drafted email to G. Cruickshank, attorney for M. Crowley regarding same	0.10 375.00/hr	37.50
	- JCG	Telephone conference with K. Lowey regarding insolvency issues in Crowley preference actions and reviewed material from K. Lowey regarding same	0.40 375.00/hr	150.00
	- JCG	Conference with liquidating trustee regarding preference actions	0.20 375.00/hr	75.00
8/29/2017	- JCG	Telephone call to G. Cruickshank, attorney for the Crowleys regarding negotiations regarding settlement of the two preference actions	0.20 375.00/hr	75.00
	- JCG	Drafted email to G. Cruickshank outlining liquidating trustee's revised settlement proposals	0.30 375.00/hr	112.50



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			<u>Hrs/Rate</u>	<u>Amount</u>
8/29/2017	- JCG	Reviewed email from G. Cruickshank regarding counteroffer	0.10 375.00/hr	37.50
	- JCG	Conference with liquidating trustee regarding settlement negotiations	0.10 375.00/hr	37.50
	- JCG	Telephone call with G. Cruickshank regarding negotiation of settlement amounts	0.10 375.00/hr	37.50
	- JCG	Drafted email to G. Cruickshank regarding final settlement proposal	0.20 375.00/hr	75.00
8/31/2017	- MLA	Office conference with James Gross and David Madoff regarding case status and next steps	0.20 150.00/hr	30.00
	- MLA	Memorandum to Verdolino & Lowey regarding employment as accountant	0.10 150.00/hr	15.00
	- JCG	Reviewed email from Gary Cruickshank agreeing to liquidating Trustee's settlement offer and drafted response	0.10 375.00/hr	37.50
	- JCG	Drafted joint motion to extend deadline for filing of joint discovery plans in preference litigation in light of settlement	0.60 375.00/hr	225.00
	- JCG	Drafted email to Gary Cruickshank regarding motions to extend and terms of payment of settlement amounts	0.20 375.00/hr	75.00
	- JCG	Reviewed response from Gary Cruickshank regarding payment	0.10 375.00/hr	37.50
	- DBM	Drafted and sent to United States Trustee the monthly operating reports for May through August	0.80 375.00/hr	300.00
9/5/2017	- JCG	Drafted settlement stipulation between liquidating trustee and M. Crowley and proposed stipulation of dismissal	1.40 375.00/hr	525.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/5/2017	-	MLA	Prepared certificate of service and Motion to Extend time to both Crowley cases; filed same	0.40 150.00/hr 60.00
	-	MLA	Prepared Motion to Employ Accountant	0.50 150.00/hr 75.00
9/6/2017	-	MLA	Reviewed Order and refiled Motion to Extend; prepared chart regarding all claims and distribution	1.20 150.00/hr 180.00
9/7/2017	-	MLA	Calendared new deadlines	0.10 150.00/hr 15.00
	-	MLA	Office conference with David Madoff regarding employment of Verdolino & Lowey and taxes	0.20 150.00/hr 30.00
9/8/2017	-	MLA	Made changes to Motion to Employ Verdolino and Lowey as accountant; prepared certificate of service; filed and served same	0.50 150.00/hr 75.00
9/14/2017	-	JCG	Reviewed emails from Gary Cruickshank regarding proposed revisions to stipulations regarding M. Crowley and T. Crowley	0.10 375.00/hr 37.50
	-	JCG	Revised settlement stipulation regarding M. Crowley and T. Crowley and drafted email to Gary Cruickshank regarding same	0.40 375.00/hr 150.00
9/18/2017	-	JCG	Reviewed email from Gary Cruickshank regarding stipulation for M. Crowley and T. Crowley	0.10 375.00/hr 37.50
	-	JCG	Meeting with the liquidating trustee regarding settlement	0.10 375.00/hr 37.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/18/2017	- JCG	Drafted motion to approve settlement stipulation with M. Crowley	1.20 375.00/hr	450.00
	- JCG	Revised motion to approve settlement with M. Crowley	0.30 375.00/hr	112.50
9/21/2017	- JCG	Drafted email to Gary Cruickshank regarding executed settlement stipulation for M. Crowley and T. Crowley	0.20 375.00/hr	75.00
9/26/2017	- JCG	Drafted and revised motion to approve settlement with Thomas Crowley	0.70 375.00/hr	262.50
	- MLA	Prepared certificate of service for adversary proceeding with the Crowleys and for settlement with the Crowleys; filed and served same	1.30 150.00/hr	195.00
9/27/2017	- MLA	Prepared certificate of service of objection deadline; filed and served same	0.80 150.00/hr	120.00
10/19/2017	- JCG	Reviewed orders approving settlements with M. Crowley and T. Crowley	0.10 375.00/hr	37.50
10/31/2017	- JCG	Office conference with Liquidating Trustee regarding trial decree and things required to make distribution and close the case	0.30 375.00/hr	112.50
	- JCG	Reviewed plan, disclosure statement and confirmation order regarding requirement for making distribution and closing case	0.40 375.00/hr	150.00
For professional services rendered			<u>67.10</u>	<u>\$21,810.00</u>

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Additional Charges :

	<u>Amount</u>
Court Costs	700.00
LexisNexis	634.44
Photocopies	438.00
Postage	246.91
Total costs	<u>\$2,019.35</u>
 Total amount of this bill	 <u>\$23,829.35</u>
 Balance due	 <u><u>\$23,829.35</u></u>

## **SCHEDULE C**

**SCHEDULE C**

DAVID B. MADOFF ([madoff@mandkllp.com](mailto:madoff@mandkllp.com)) previously practiced with the New York law firm of Hughes, Hubbard & Reed and was a partner of Cohn Khoury Madoff & Whitesell LLP in Boston. He received his B.A. in 1985 from Columbia University and his J.D. in 1988 from Boston University School of Law, where he served as an editor of the Boston University Law Review. Mr. Madoff has lectured frequently and written articles for Massachusetts Continuing Legal Education and other associations in the area of bankruptcy litigation. He serves on the panel of Chapter 7 trustees for the District of Massachusetts, Eastern Division. Mr. Madoff has been certified with an AV rating (the highest rating) by Martindale Hubbell Corporation, a national legal networking and rating firm.

JAMES C. GROSS ([gross@mandkllp.com](mailto:gross@mandkllp.com)) has been a member of the Massachusetts Bar since 1977. He previously was a partner in the Boston law firm of Friedman & Atherton, and, in 1989, became a founding member of the Boston law firm of Klieman, Lyons, Schindler & Gross, where he served as managing partner. He received his B.A. from the University of Rochester in 1972 and his J.D. from Boston University School of Law in 1976. Prior to joining Friedman & Atherton, Mr. Gross served as a law clerk to the Honorable Thomas W. Lawless, Chief Judge of the United States Bankruptcy Court for the District of Massachusetts. He has had extensive experience in representing both debtors and creditors in bankruptcy cases and workouts. Mr. Gross is a member of the Boston Bar Association and has been named as a Massachusetts Super Lawyer by Boston Magazine. Mr. Gross has been granted an "AV" rating from Martindale Hubbell Corporation and has also been designated a "Superlawyer" in peer reviews conducted by Boston Magazine.

STEFFANI PELTON ([pelton@mandkllp.com](mailto:pelton@mandkllp.com)), an associate with the firm, received her B.A. in 2003 from Kent State University and her J.D. in 2006 from Suffolk University Law School. Ms. Pelton's practice focuses on litigation, bankruptcy and commercial litigation and workout arrangements.

MICHELLE L. P. ALSTON ([alston@mandkllp.com](mailto:alston@mandkllp.com)), a paralegal with the firm, previously worked as a paralegal for Cohn Khoury Madoff & Whitesell LLP in Boston, Mirick, O'Connell, DeMallie & Lougee, LLP in their bankruptcy/creditors' rights department and Jillian K. Aylward, Esq., whose law practice dealt primarily with bankruptcy/insolvency. Ms. Alston received her B.S. in 1994 from the University of Massachusetts – Lowell and currently assists David Madoff, Esq., a member of a panel of Chapter 7 Trustees for the District of Massachusetts, Eastern Division.